

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

**AMANDA DEL TORO, DANIEL WERNER,
JENNIFER MCGREGOR-HALSTEAD,
JOSHUA CHROMICK, AND ALL OTHERS
SIMILARLY SITUATED,**

Plaintiffs,

v.

**CENTENE MANAGEMENT COMPANY,
LLC,**

Defendant.

Civil Action No. 4:19-cv-02635

**JOINT MOTION FOR APPROVAL OF SETTLEMENT UNDER THE FAIR LABOR
STANDARDS ACT, FOR APPOINTMENT OF SETTLEMENT ADMINISTRATOR,
FOR APPROVAL OF SERVICE AWARDS, AND FOR APPROVAL OF ATTORNEYS'
FEEES AND COSTS**

Named Plaintiffs Amanda Del Toro, Daniel Werner, Jennifer McGregor-Halstead, and Joshua Chromick and Defendant Centene Management Company, LLC (“the Parties”) respectfully request that the Court enter an Order, in the form attached hereto as Exhibit A, approving the Parties’ Confidential Settlement Agreement (“Settlement Agreement”) as a fair and reasonable resolution of a *bona fide* dispute under the Fair Labor Standards Act.

As demonstrated in the accompanying Memorandum of Law, the Parties’ settlement constitutes the resolution of a *bona fide* dispute between the parties and is the result of arm’s length negotiations, conducted by experienced counsel for all Parties, after litigating this case for over a year and attending two mediation sessions with an experienced mediator. The terms of the settlement are fair and reasonable to all Parties.

As a result, the Parties respectfully request that the Court approve the Settlement and permit the Parties to effectuate its terms using the forms and procedures set forth in their Agreement. Plaintiffs also ask, consistent with the Agreement, that the Court appoint Rust Consulting as the third-party Administrator and approve the following amounts to be paid from the Gross Settlement Fund: (i) Service Awards to the Named Plaintiffs and to the Opt-in Plaintiffs as stated in the Agreement; (ii) Attorney's Fees in an amount equal to 35% of the Gross Settlement Fund, (iii) Litigation Costs in an amount of \$7,317; and (iv) settlement administration fees to Rust Consulting estimated to be \$12,600.

For these reasons and those stated in the accompanying Memorandum, the Parties respectfully request that the Court approve the Parties' Settlement Agreement.

Dated: April 12, 2021

Respectfully submitted,

By: /s/ Maureen A. Salas

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served on all counsel of record through the court's ECF system as of the date file-stamped thereon.

/s/ Maureen A. Salas

MAUREEN A. SALAS